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11 **UNITED STATES DISTRICT COURT**
12 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

13 **EMERALD SITE SERVICES, INC., a**) Case No. 2-23-cv-02982-DJC-AC
14 **California Corporation,**) *[The Honorable Daniel J. Calabretta]*
15 **Plaintiff,**)
16 **v.**)
17 **PAPÉ MACHINERY, INC., an Oregon**) **STIPULATION AND ORDER**
18 **Corporation; JOHN DEERE**) **REGARDING BRIEFING SCHEDULE**
19 **CONSTRUCTION & FORESTRY**) **AND HEARING DATE FOR**
20 **COMPANY, a Delaware Corporation;**) **DISPOSITIVE MOTIONS**
21 **DEERE & COMPANY, a Delaware**)
22 **Corporation; and DOES 1-100, inclusive,**)
23 **Defendants.**)
24 _____)

25 The parties to this action, Emerald Site Services, Inc., Papé Machinery, Inc., and John
26 Deere Shared Services, LLC, stipulate as follows:

27 Whereas the current Scheduling Order (ECF No. 9) provides for a filing deadline for
28 dispositive motions of October 3, 2025, and a hearing date of December 4, 2025.

Whereas the parties have met and conferred regarding Defendants' intent to file motions
for summary judgment, and propose the following briefing schedule for dispositive motions:

Dispositive Motion Filing Deadline: October 20, 2025

Oppositions: November 10, 2025

Replies: November 20, 2025

**STIPULATION AND ORDER REGARDING BRIEFING SCHEDULE AND HEARING DATE FOR
DISPOSITIVE MOTIONS**

1 Whereas the parties are amenable to a dispositive motion hearing date of December 18,
2 2025.

3 Therefore, the parties request that the Court continue the dispositive motion briefing
4 schedule and hearing date as set forth above.

5
6 IT IS SO STIPULATED.

7
8 Dated: September 18, 2025 KROGH & DECKER, LLP

9
10 By: */s/ Trevor A. White*
11 (As authorized on 9/17/25)
12 SHAWN M. KROGH
TREVOR A. WHITE
Attorneys for Plaintiff
EMERALD SITE SERVICES, INC.

13 Dated: September 18, 2025 LEWIS BRISBOIS BISGAARD & SMITH LLP

14
15 By: */s/ Graham M. Cridland*
16 (As authorized on 9/18/25)
17 CHARLES S. PAINTER
GRAHAM M. CRIDLAND
Attorneys for Defendant
PAPÉ MACHINERY, INC.

18 Dated: September 18, 2025 THE RYAN LAW GROUP

19
20 By: */s/ Rebekka R. Martorano*
21 TIMOTHY J. RYAN
REBEKKA R. MARTORANO
Attorneys for Defendant
JOHN DEERE SHARED SERVICES, LLC

1 **ORDER**

2 Pursuant to the stipulation of the parties, the Scheduling Order in this case (ECF No. 9) is
3 amended and a briefing schedule is approved as follows:

4 Dispositive Motion Filing Deadline: October 20, 2025
5 Oppositions: November 10, 2025
6 Replies: November 20, 2025
7 Dispositive motion hearing date: December 18, 2025, 1:30 p.m.

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9
10 Dated: September 18, 2025

/s/ Daniel J. Calabretta

11 THE HONORABLE DANIEL J. CALABRETTA
12 UNITED STATES DISTRICT JUDGE